

**Before the
Federal Communications Commission
Washington, DC 20554**

In the matter of)	
National Telecommunications and)	RM-10821
Information Administration petition for)	
Rulemaking)	
and)	
MariTEL, Inc. petition for declaratory ruling)	DA 03-3585
regarding)	
the use of maritime VHF channels 87B and 88B)	10 December 2003

REPLY COMMENTS OF THE NATIONAL GMDSS TASK FORCE

The National Implementation Task Force for the Global Maritime Distress and Safety System (GMDSS) supplements government functions through outreach to the private sector and recommendation to regulatory authorities. The Task Force membership is broadbased including over 1500 representatives of commercial vessel operations, recreational boating interests, training institutions, service agents, manufacturers, and government authorities. The Task Force maintains a website at www.navcen.uscg.gov/marcomms which contains numerous GMDSS Information Bulletins, records of Task Force meetings, and various letters and petitions seeking regulatory action.

In replying to comments on the referenced proceedings, the Task Force wishes to support the comments of the RTCM and others endorsing the NTIA Petition. The Task Force's work in the international arena clearly demonstrates the need for uniform operating procedures, especially those resulting from international agreements. The Task Force has sought to keep its members informed of AIS developments since it is closely related to the GMDSS and uses the same frequency band and identification protocols. An operational process whereby ships would need to shift AIS frequencies when arriving near the U.S. coastline would be a disaster for maritime safety and security. Therefore it is imperative that the internationally recognized AIS frequencies be used in U.S. waters.

The Task Force has actively supported MariTEL's efforts to establish an integrated VHF public correspondence service in full compliance with the GMDSS and international planning for use of the band. The Task Force is accordingly disappointed that market forces apparently prevented MariTEL from developing a viable service. We must, however, object to their new proposal to manage government AIS functions.

Task Force members are especially concerned regarding the implications of MariTEL's more recent petition to be designated as the exclusive frequency coordinator for AIS. This issue has been opened for public comment in docket DA 03-3669, and the Task Force wishes to go on record as strongly opposed to this action which would clearly not be in the best interests of the maritime public. The Task Force considers this proposal unprecedented from the standpoint that other frequency coordinators are non-profit organizations with the full support of the users of the frequencies. The Task Force feels that designation of a for-profit coordinator to manage what is essentially a government responsibility is both inappropriate and unworkable given the participation of foreign flag vessels in the U.S. AIS service. Regrettably, the Task Force must also conclude that a long record of broken promises to the maritime public and highly questionable regulatory maneuverings have undermined confidence in MariTEL to the point that they now enjoy little or no support from the maritime sector.

More specifically, the Task Force is alarmed at the proposed fee schedule and MariTEL's apparent intent to take over assignment of MMSI numbers with initial and recurring fees and to conduct engineering studies chargeable to applicants. While MariTEL notes the ongoing assignment of MMSI numbers by BOAT US and Sea Tow, it is quite possible that full implementation of the Maritime Security Act could extend AIS requirements to some fishing vessels and recreational vessels bringing them into the MariTEL fee schedules.

The Task Force regrets that the Commission elected to release these dockets for public comment without the option for electronic filing. Many of the Task Force members are small firms without Washington law firms on retainer to handle such matters and such procedures sharply curtail the number of responses. Further, the tight time frames make it difficult for organizations with diverse membership to encourage timely responses.

For the National GMDSS Implementation Task Force

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